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13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA,

17 Plaintiff,

18 v.

19 MARIA ALICIA TORRES-GUTIERREZ,

20 Defendant.

21) Case No. CR 18-458 RS (2)

22) **STIPULATION AND [PROPOSED] ORDER**
23) **CONTINUING STATUS CONFERENCE AND**
24) **EXCLUDING TIME UNDER THE SPEEDY**
25) **TRIAL ACT**

26 This matter is presently set for a status conference on July 16, 2019. Ms. Torres-Gutierrez is
27 currently on pretrial release and resides in the Central District of California. Counsel are in active
28 negotiations with regard to a potential pretrial disposition in this matter. Additionally, defense counsel is
exploring the possibility of resolving this matter in the Central District of California pursuant to Rule 20
of the Federal Rules of Criminal Procedure and is in the process of consulting with the Federal Public
Defender for that district in furtherance of this possibility. For these reasons, the parties stipulate and
respectfully request the Court continue the status conference from July 16, 2019 to August 6, 2019 at 2:30
p.m.

27 For the same reasons, the parties also stipulate that the time between July 16, 2019 and August 6,
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1 2019, should be excluded from calculation under the Speedy Trial Act for the effective preparation of
2 counsel and that ends of justice served by any such continuance outweigh the best interests of the public
3 and the defendant in a speedy trial.

4 **IT IS SO STIPULATED** this 12th day of July, 2019.

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6 DAVID L. ANDERSON
United States Attorney

MOEEL LAW OFFICE

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8 /s/
9 NIKHIL BHAGAT
Assistant United States Attorney
Attorneys for the United States

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11 /s/
12 SHAFFY MOEEL
*Attorney for Maria Alicia Torres-
Gutierrez*

13 **[PROPOSED] ORDER**

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15 For good cause shown, with respect to defendant Maria Alicia Torres-Gutierrez, the status
conference hearing presently set for July 16, 2019 at 2:30 p.m. is continued to August 6, 2019 at 2:30
p.m.

16 Based upon the stipulation of counsel and for good cause shown, the Court finds that failing to
exclude the time between July 16, 2019, and August 6, 2019 would deny counsel the reasonable time
necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. §
17 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from July
18 16, 2019 through and including August 6, 2019, from computation under the Speedy Trial Act outweigh
19 the best interests of the public and the defendants in a speedy trial. Having made these findings, it is
20 hereby **ORDERED** that the time from July 16, 2019 through and including August 6, 2019, shall be
21 excluded from computation under the Speedy Trial Act as to this defendant. 18 U.S.C. § 3161(h)(7)(B)(iv).

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23 **PURSUANT TO STIPULATION, IT IS SO ORDERED** this 12th day of July, 2019.

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27 THE HONORABLE RICHARD SEEBOORG
28 UNITED STATES DISTRICT JUDGE